

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COLLEGE REPUBLICANS OF THE
UNIVERSITY OF WASHINGTON; and
CHEVY SWANSON, an Individual,

Plaintiffs,

v.

ANA MARI CAUCE, in her official capacity
as president of the University of Washington;
GERALD J. BALDASTY, in his official
capacity as provost and executive vice
president; RENE SINGLETON, individually
and in her official capacity as assistant director,
Student Activities; CHRISTINA COOP,
individually and in her official capacity as
senior activities advisor, Student Activities;
JOHN N. VINSON, individually and in his
official capacity as Chief of the University of
Washington, Seattle, Police Department;
CRAIG WILSON individually and in his
official capacity as University of Washington,
Seattle, Police Department Patrol Commander;
and DOES 1-25;

Defendants.

No. 2:18-CV-00189 MJP

DECLARATION OF CHRISTOPHER
JAROSS

I, Christopher Jaross, state as follows:

1. I am over the age of eighteen and competent to testify herein.

2. I am a Lieutenant with UWPD, and have been in that position since October, 2011. I have been a law enforcement officer for 18 years. I was hired by UWPD in August 21, 2000 as a Police Officer. My assigned duties currently include the coordination and logistical liaison for groups that are holding events on campus that may need Police/Security assistance.

3. In my role as Lieutenant, I have been involved with developing and implementing security plans for hundreds of events that may affect campus safety, security, and operation. These events include everything from Husky sporting events to University events like Commencement, Convocation, and events hosted by departments within the University and student organizations (Registered Student Organizations (RSOs)). As a result, I have extensive knowledge of UWPD's security planning process for campus events, including how UWPD develops an appropriate security plan and calculates security fees to pay for any enhanced security measures. I am also familiar with the Safety and Security Protocols for Events Sponsored by Student Organizations (the "Protocols"), which memorializes these processes.

4. The following chart sets forth the enhanced security fees assessed by UWPD for events hosted by student organizations in 2017:

Event Date	Event Title	Sponsoring Student Group	Amount Invoiced	Date Invoiced	Date Paid
1/20/2017	Milo Yiannopolis Event	College Republicans	\$9,120.92	2/28/2017	3/1/2017
2/18/2017	Alpha Delta Phi Dance	Alpha Delta Phi	\$403.92	2/28/2017	3/10/2017
3/4/2017	Phi Kappa Phi Founders Day	Phi Kappa Phi	\$427.68	3/31/2017	4/5/2017

3/7/2017	Shaun King Lecture	ASUW	\$3,130.38	3/31/2017	4/5/2017
4/1/2017	Desi Dhamaka Event	Desi Dhamaka	\$855.36	4/30/2017	5/5/2017
4/8/2017	Spring Pow Wow (Apr. 8 & 9)	First Nations at UW	\$4,371.84	4/30/2017	5/5/2017
5/5/2017	Poly Day	Polynesian Student Alliance	\$2,862.39	5/31/2017	6/7/2017
5/13/2017	Night Market Security	Taiwanese Student Association	\$950.40	5/31/2017	6/7/2017
5/19/2017	ASUW Spring Concert	ASUW	\$3,310.07	5/31/2017	6/7/2017
9/25/2017	Fall Fling 2017	ASUW	\$2,284.04	9/30/2017	10/9/2017
10/20/2017	Phi Kappa Sigma Founder's Day	Phi Kappa Sigma	\$1,496.44	10/31/2017	11/7/2017
11/15/2017	Dinesh D'Souza	Young Americans for Freedom	\$3,150.40	12/15/2017	Invoiced
Total			\$32,363.84		

5. I was directly involved in the security planning process for all of the 2017 events in the chart above, including the determination of how many officers would be needed for the event. UWPD followed the same security planning process, now memorialized in the Protocols, for all of these event. For each event, UWPD charged fees based on the enhanced security measures that were needed to maintain safety and order at the student organization's event. The amount of fees varied because the events did not all require the same enhanced security. These differences included the size of the expected audience, whether the general public was invited, venue characteristics, date and time, and event history. In addition, the recharge rates for

1 UWPD officers increased from FY 2016-17 to FY 2017-18 due to higher UWPD operating
2 costs, including a 10% salary raise negotiated by the union.

3 6. At the Yiannopoulos event, security was provided by UWPD, as well as state and
4 local law enforcement. Despite this enhanced security, one person was shot and critically
5 injured by a supporter of Yiannopoulos, and many others at the event were assaulted and
6 wounded. College Republicans were billed only for costs for security provided for Kane Hall,
7 not security provided by other law enforcement for the crowds that gathered outside Kane Hall.
8

9 7. In March 2017, UWPD provided enhanced security for a talk by Shaun King, a
10 Black Lives Matter supporter, hosted by ASUW Arts & Entertainment and ASUW Black
11 Student Commission. UWPD's security plan for the event included seven officers to provide
12 security for the event. Less security was required for the King talk than the Patriot Prayer rally
13 due to differences in event factors that UWPD takes into account in determining what security
14 measures are needed for an event. For example, unlike the Patriot Prayer event, the event was
15 held indoors at the HUB Ballroom on a Wednesday evening. Red Square has multiple access
16 points and buildings, which can make it more difficult to secure, particularly if there is a reason
17 to believe attendees may be armed in violation of the University's ban on firearms. While the
18 College Republicans invited the general public to attend the Patriot Prayer event, attendance for
19 the Sean King event was limited to ticketed students, faculty, and staff with current UW IDs.
20 Also unlike Patriot Prayer, UWPD's research and analysis, including consultation with the FBI,
21 did not give UWPD reason believe that King or his supporters, through their conduct, would
22 commit or incite violence on campus. I am not aware of any reports of violence or other
23 incidents related to the King event.
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1 8. Several of the other 2017 events hosted by student organizations are held
2 annually. For annual events, UWPD typically deploys the same security measures unless there
3 was an incident the year prior or a change in another event factor, such as expected attendance,
4 duration, or format. For example, UWPD historically provided two officers for the first day of
5 the Spring Pow Wow hosted by First Nations of the University of Washington. However,
6 because of car prowls that occurred during the time of the previous year's Pow Wow, UWPD
7 required and charged for an additional officer in subsequent years to patrol campus parking lots
8 near the venue. Similarly, UWPD increased the number of police officers for the annual
9 Polynesian Day, hosted by Polynesian Student Alliance, after a brawl broke out at the scheduled
10 Poly Day event.
11

12 9. I attended the Patriot Prayer event held in Red Square on February 10, 2018. I
13 was posted in the Walker Ames Room and adjoining balconies to observe the crowd. I observed
14 several violent clashes between rally participants and counter-protestors. At one point, I saw a
15 large man wearing a hooded sweatshirt exit the area designated for the Patriot Prayer rally
16 participants and approach counter protestors. This large man and several of his compatriots
17 were acting confrontational and there appeared to be the potential for violence. Based on my
18 first-hand observation, the large man in the hoodie goes by the name of "Tiny" and is a known
19 spokesperson of Patriot Prayer. I am familiar with "Tiny" because of intel provided by the FBI.
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22 I declare under penalty of perjury under the laws of the State of Washington that the
23 foregoing is true and correct to the best of my knowledge.

24 Dated this 27th day of March, 2018.
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CHRISTOPHER JAROSS

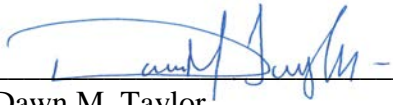
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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of March, 2018, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

DATED this 27th day of March, 2018.


Dawn M. Taylor